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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

IN RE:)	CASE NOS. CV03-00325 REJ LEK
HAWAII FEDERAL ASBESTOS CASES)	CV03-00326 REJ KSC
)	
LORENZO BACLAAN and NAOMI)	PLAINTIFFS' MOTION TO (1)
BACLAAN, et al.,)	APPROVE ENTERING INTO
)	STIPULATION WITH TRUSTEE IN
Plaintiffs,)	THE ARTER & HADDEN LLP
vs.)	CHAPTER 7 BANKRUPTCY, AND (2)
)	ISSUE AN ORDER TO SHOW CAUSE
COMBUSTION ENGINEERING, INC., a)	TO THE "MINIDOM INSURERS";
Delaware corporation, et al.,)	MEMORANDUM IN SUPPORT OF
)	MOTION; DECLARATION OF
Defendants.)	COUNSEL; EXHIBITS A-F;
)	CERTIFICATE OF SERVICE
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IN RE:)	
HAWAII FEDERAL ASBESTOS CASES)	
)	
GEORGE H. TORO and VIVIAN TORO, et al.,)	
)	
Plaintiffs,)	
vs.)	
)	
COMBUSTION ENGINEERING, INC., a)	
Delaware corporation, et al.,)	
)	
Defendants.)	

**PLAINTIFFS' MOTION TO (1) APPROVE ENTERING
INTO STIPULATION WITH TRUSTEE IN THE ARTER & HADDEN
LLP CHAPTER 7 BANKRUPTCY, AND (2) ISSUE AN
ORDER TO SHOW CAUSE TO THE "MINIDOM INSURERS"**

Plaintiffs hereby move this Honorable Court pursuant to FRCP 23 for permission to enter into the "Stipulation Regarding Trustee's First Omnibus Objection to Claims", a true and correct copy of which is attached hereto and marked as Exhibit A. The purpose of this Stipulation would be an agreement to lift the automatic bankruptcy stay in favor of debtor Arter & Hadden LLP and to permit Plaintiffs to pursue their remedies in state or federal court only to the extent of insurance coverage but not against any other assets of Arter & Hadden.

Plaintiffs also respectfully request this Honorable Court to issue an Order to Show Cause to the insurers of Defendants Robert B. Preston, Esq. and Arter & Hadden LLP, to state whether said insurers are denying coverage or conceding coverage of the claims made herein, and if denying coverage, on what grounds.

This Motion is based upon the Memorandum of Law attached hereto, Declaration of Counsel, exhibits attached thereto and all the pleadings and papers filed herein.

/s/ L. Richard DeRobertis
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